



NASA/JSC Language Access Plan

Office of Equal Opportunity and Diversity December, 2011



LANGUAGE ACCESS PLAN UNDER EXECUTIVE ORDER 13166, IMPROVING ACCESS TO SERVICES FOR
PERSONS WITH LIMITED ENGLISH PROFICIENCY

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Executive Summary

Under Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” (2000) NASA, as a federal agency, is required to take steps to provide meaningful access to its programs and activities to members of the public who are limited in their English proficiency (LEP). At the Johnson Space Center (JSC), home of human spacecraft development and the Agency’s Astronaut Program, this would include Building 110’s emergency evacuation signage, selected education and awareness opportunities, and international partner delegations.

NASA has developed a Language Access Plan (LAP) and an update to its 2000 LAP, to meet the objectives of the Executive Order. JSC has appointed the Director of the Office of Equal Opportunity and Diversity (OEOD) to serve as the Center’s LEP Coordinator and lead of the Center LEP Working Group. The following organizations are deemed key Center stakeholders because of their roles and responsibilities in Center programs and activities most likely to include LEP program participants:

- Office of Equal Opportunity and Diversity
- Human Resources (Starport)
- Office of External Relations
 - Office of Communications and Public Affairs
 - Office of Education
- Center Operations Directorate
 - Security Operations

The JSC LEP Coordinator is responsible for working in partnership with Center stakeholders, i.e., Office of External Relations or Center Operations. Just as at the Agency level, the Center Coordinator, in partnership with stakeholders, will be responsible for developing and overseeing implementation of a Center LAP consistent with the Agency LAP.

The Office of International and Interagency Relations (OIIR) Resources Management Division manages the Agency-wide interpretation/translation service and visa-processing contract. With appropriate funding, use of this established interpretation/translation contract service is available to JSC to support these requirements.

It is anticipated that, through interpretation and translation services, JSC will take reasonable steps to ensure meaningful access for LEP persons to the following programs and activities, among others:

- JSC website pages, with special emphasis given to mission-oriented information, for example, current missions and planning.
- JSC Center Operations (Building 110) available information.
- Notices advising prospective participants in JSC-conducted educational and training programs and activities of the availability of language assistance services.

NASA has prepared an LAP and will implement it in the spirit of Executive Order 13166. That is, the Agency will hold to the same standards as Federal civil rights laws, and with an eye toward serving an ever-growing and ever more diverse population.

Introduction

It is noteworthy that NASA's charter uniquely requires the Agency to provide the widest possible dissemination of information on its activities (Section 203(a)(3) of the National Aeronautics and Space Act of 1958, as amended). Therefore, accommodation of the language assistance needs of LEP persons is not only consistent with the requirements of Executive Order 13166, but it also helps NASA to meet its obligations under the Space Act of 1958.

Throughout its 53-year history, NASA has enjoyed great success in communicating with the public. Scientific breakthroughs and space exploration achievements have been publicized through a variety of media, from radio, newspapers and television to today's social networking sites and online publications. As we move forward in this new millennium, a changing world has expanded NASA's charter for public outreach. Executive Order 13166 challenges us to ensure greater access to our programs and, indeed, to our story as an Agency.

The primary purpose of the Executive Order in regard to federally conducted programs is to better ensure that people for whom English is not a first language (people who may be said to be "limited" in their English proficiency), may still have reasonable meaningful access to the programs and services offered by Federal agencies. JSC's LAP meets the objectives of Executive Order 13166 and is consistent with the U.S. Department of Justice's (DOJ) guidance; emphasizing that, to avoid discrimination against LEP persons on grounds of national origin, Federal agencies must take adequate steps to ensure that people who are not proficient in English can effectively participate in and benefit from its conducted programs and activities.

The Executive Order may allow persons to receive the language assistance necessary to afford them meaningful access to federally conducted programs and activities. ***The concern is not with employees or contractors of Federal agencies but rather with members of the public affected by or seeking to participate in a program or service provided by the Agency.*** At JSC, this might mean any number of programs or activities sponsored by the following Center organizations:

- JSC Security Operations (Building 110)
- External Relations Office
- Human Resources (Starport)

JSC's Language Access Implementation Plan

1. Officials Charged with Implementing the Plan

a) Agency Level

The Director of Program Planning and Evaluation Division (PPE) and the Office of Diversity and Equal Opportunity (ODEO), shall serve as the Agency's Language Access or LEP Coordinator. The PPE Director reports directly to the Agency's Associate Administrator (AA) for Diversity and Equal Opportunity, the highest-ranking diversity and Equal Opportunity (EO) official at NASA. In turn, the AA, ODEO, reports directly to the NASA Administrator.

The Agency LEP Coordinator has the following main roles and responsibilities:

- Development and oversight of Agency language access policy directives, plan, and procedures to provide meaningful access to LEP persons.
- Oversight, performance, and implementation of the language access plan.
- Coordination of an Agency-level LEP Working Group of key stakeholders (as defined in this section) to assist in creating and implementing language access procedures for the Agency.
- Interface and coordination with the Office of International and Intergovernmental Relations on the Agency's management of its interpretation and translation services.

The following Agency organizations (and their Center counterparts) are key Agency stakeholders because of their roles and responsibilities in Agency programs and activities most likely to include LEP program participants:

- Office of the Chief Information Officer
- Office of Communications
- Office of Education

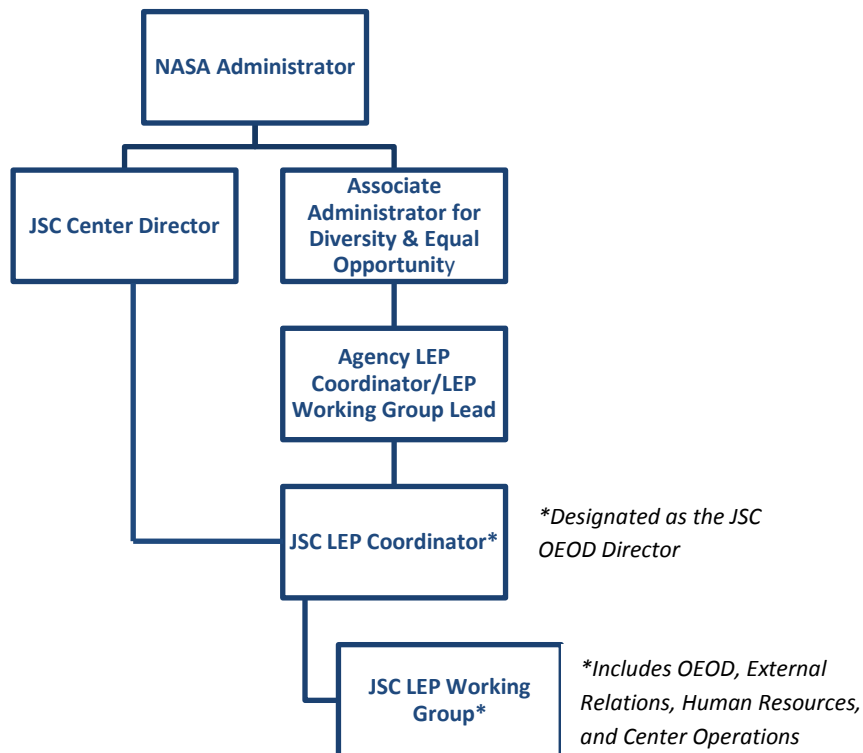
b) Center Level

Each NASA Center, including JSC, has named an LEP Coordinator. Center LAPs should detail the chains of command for authority and oversight. Center LEP Coordinators are responsible for:

- Developing and overseeing implementation of a Center LAP, consistent with the Agency LAP.
- Communicating with the Center Director and other top Center management on the development and implementation of the plan.
- Seeking the needed resources for plan deployment.
- Identifying qualified interpreters and translators to be included in an interpreter database.
- Interfacing with the Agency Office of International and Intergovernmental Relations Resources Management Division, which administers the Agency's interpretation/translation services contract to make the necessary arrangements to support proposed LEP activities, on an as-needed basis.
- Ensuring appropriate training is provided to Center staff with roles and responsibilities under the plan.
- Monitoring the Center plan's progress and periodically reporting to the Agency LEP Coordinator.

i. JSC's Chain of Command for Authority

The chain of command for authority and oversight is shown in the chart below. The organizational chart shows coextensive responsibility and coordination with other Organizations.



2. Services, Benefits, and Activities Provided Directly to the Public: How JSC Interacts with LEP Communities:

JSC's sponsored programs and activities generally fall under the External Relations Office and Building 110, each associated with the Center and identified as a key stakeholder, i.e. a member of JSC's LEP Working Group.

a) JSC External Relations Office

JSC communicates with the public through a variety of media, with the center's public website serving as a preeminent means of informing and engaging the public on our missions and resulting accomplishments. The External Relations Office (AD) is responsible for shaping JSC's public messaging

- **JSC News Events and Public Outreach Activities.** This may include press releases, fact sheets, responses to media requests from non-English language news organizations, and selected outreach events.
- **Mission Oriented Materials and Information.** This may include material residing on JSC's webpages, specifically information about current NASA missions and achievements, including robotic and human space flight programs, and other important agency priorities.
- **NASA/JSC TV Programming.** JSC TV produces live television coverage of mission activities, news video footage, satellite media interviews and press conferences to be provided to the executive producer of NASA TV at NASA HQ for broadcast on a variety of NASA TV channels.

b) JSC Educational Programs and Activities

The Agency's current education-related Strategic Goal is to "share NASA with the public, educators, and students to provide opportunities to participate in our Mission, foster innovation, and contribute to a strong national economy."¹ This goal encompasses national objectives that clearly impact LEP individuals, particularly elementary and secondary school students. For example, these objectives include providing NASA educational experiences that inspire student interest and achievement in science, technology, engineering and mathematic (STEM) disciplines and informing, engaging, and inspiring the public by sharing NASA's missions, challenges, and results. In both areas, NASA strives to be inclusive of under-represented and under-served communities.

Based on its strategic goals and objectives, the JSC Office of Education's encounters with LEP populations may include:

- Educator Professional Development workshops (if JSC sponsored)
- Student competitive opportunities
- Brochures and lithographs
- Videos that include teacher guides
- Interactive websites

c) Space Center Houston (JSC's Public Visitors Center)

Space Center Houston (SCH) is the Official Visitors Center of JSC and is a separate operating non-profit entity. SCH receives federal financial assistance from JSC and as such, OEOD will encourage SCH that the proper LEP requirements and signage are met by communicating the requirements. The focus from an LEP perspective is on ensuring meaningful access to all of JSC's programs and activities, including LEP information posted at SCH.

d) JSC Security Operations (Building 110)

The JSC Security Operations building is located on site and is a control process for individuals who visit JSC for official business and need a visitor's badge. The JSC Security personnel will be trained on the process of engaging the LEP process when services are requested by individuals who visit the Center. In addition, availability of LEP services will be posted in the building in both paper and electronic forms.

3. Identification and Assessment of LEP Communities

JSC's assessment of its LEP communities is based on the elements of DOJ's Model Self-Assessment, "Identification and Assessment of LEP Communities." Consistent with DOJ's guidance, this plan outlines, from an Agency perspective, an estimate of the percentage of LEP individuals who are eligible to receive each service, benefit, or activity. ***At the Center level, LEP Coordinators shall work with key stakeholders (including the Center OEOD Office, if the Coordinator does not reside in that office) to develop Center plans based on the model established below (see also Objectives, Timeframes, and Benchmarks for this section).***

a) Estimate of Eligible LEP Individuals

This plan shows the analysis conducted to assess the number or proportion of LEP persons from each language group in JSC's service area, Houston (Harris County).

¹ 2011 NASA Strategic Plan (February 2011), p.30.

English is the predominant language of the United States. According to the U.S. Census Bureau’s American Community Survey (ACS) data, 1.6 percent of all U.S. residents age five or older speak English “not at all.” This population totaled approximately 4,494,991, or 8 percent of the total population of persons five or older whose primary language was other than English. These individuals cannot speak, read, write or understand the English language at a level that could permit them from benefiting from NASA/JSC conducted programs and activities.

Languages other than English spoken in the United States follow clear trends in general, with Spanish being the most widely spoken language in most cases. Over 61 percent of all speakers of other languages are Spanish speakers. In Texas, Spanish speakers make up an overwhelming majority of speakers other than English speakers at 86 percent. The following table illustrates the top ten languages other than English spoken in Texas, where JSC conducts programs or outreach to the public by both number of speakers and percentage of total speakers of languages other than English.

Prevalence of non-English Languages spoken in Texas, Number of Speakers, and Percentage of Total Speakers of Languages other than English, 2008-2010

State	NASA Center	Language									
TX	JSC-Houston	Spanish	Vietnamese	Chinese	German	Tagalog	French	Urdu	Korean	Arabic	Hindi
		6,338,224	160,434	83,298	73,455	57,427	55,723	49,176	49,123	45,461	42,238
		86%	2%	1%	1%	1%	1%	1%	1%	1%	1%

From “Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over: 2006-2008,” U.S. Census Bureau, American Community Survey, 2006 -2008.

JSC’s Closest School Districts: LEP Student Enrollment Data by Race/Ethnicity

State	Center	School District		American Indian or Alaska Native	Asian or Pacific Islander	Hispanic	Black	White	Two or more	Total
TX	JSC - Houston	Houston Independent	#	115	1740	58550	935	880	40	62265
			%	0.1%	0.9%	28.9%	0.5%	0.4%	0.0%	30.7%
TX	JSC-Houston	Clear Creek Independent (as of October 2011)	#	4	1138	1935	28	22	0	3127
			%	0%	2.9%	4.9%	0.10%	0.10%	0%	8%

From the U.S. Department of Education Civil Rights Data Collection, headcounts and percentages of students currently enrolled in a school LEP program, 2009 and from the Clear Creek Independent School District.

b) Determining the Frequency with Which LEP Individuals Interact with JSC

Determining the frequency with which LEP individuals interact with JSC was accomplished through a center-wide analysis conducted by the JSC OEOD. This data was used as a point of departure for determining appropriate language assistance services for JSC’s service area, e.g. frequency of contact with

LEP populations. The conclusion of the survey showed that there have never been any requests made by LEP individuals to JSC.

Frequency Related Self-Assessment Questions and Guidance

What are the language groups with which JSC is likely to have the most frequent contact based on the data provided above? [Note: It is just as important to focus on those language groups in the local area of JSC with the largest percentages reporting that English is spoken “not well” or “not at all” as it is to focus on the largest language groups in general.]

How frequent are those contacts relative to the programs and activities identified in Section 3 above, i.e., what are the points of contact where LEP persons interact with JSC the most frequently?

Does the frequency of contact vary by language group? If so, does this make a difference in program delivery? How?

Do JSC’s public outreach efforts have an impact on the number of LEP persons participating in the center’s programs? If so, what is the impact? What are the implications for ensuring meaningful access to programs and activities, if any?

What language assistance, e.g., interpretation, translation, needs to be provided to LEP persons for each point of contact? (See Section 5 below.)

4. Notice of LEP Services

It was determined that the availability of LEP services needs to be advertised whenever JSC is conducting a program or activity that involves the public. The JSC LEP Coordinator will work with the External Relations Office to ensure that the public participating in a JSC-conducted activity are made aware of these services. In addition, JSC LEP Coordinator will work with the Security Office to ensure proper LEP postings are made available in Building 110, where non-JSC individuals often traffic. *(Please see Appendix D, JSC’s LEP Survey).*

5. Language Assistance Services

The JSC LEP Coordinator shall consider the appropriate balance of written translations and oral language assistance needed to allow meaningful access to the Center’s services, benefits, and activities. Upon receipt of an LEP request, the JSC LEP Coordinator will conduct a four-factor analysis to determine if reasonable steps need to be taken to ensure meaningful access for LEP persons **(see Appendix A, Four-Factor Analysis).**

The services are available to all NASA Centers via the Agency-wide contract. Use of the service is subject to availability of funding. The JSC LEP Working Group will take appropriate steps to ensure that the need for funding for such services is fully communicated to top center leadership and that efforts are made to secure increased funding, as needed, based on the four-factor analysis. ***JSC will address the following questions with its Working Group and will review and update this plan as needed:***

- What resources are needed to provide the language assistance services?
- What is the funding source?
- Are efforts to obtain additional funding necessary? If so, what steps will need to be taken?

Procedures for Utilizing Translation and Interpretation Services

To obtain translation and interpretation services, the JSC OEOD must complete NASA Form (NF) 1681, Request for Interpretation/Translation Services, specifying exactly what form of interpretation or translation is needed. Once the OIIR Resources Management Division receives the completed NF 1681 and the necessary funding arrangements are confirmed, it will work with JSC to process the request as quickly and efficiently as possible.

JSC has a separate contract with Tech Trans International (TTI). TTI provides expert translators, interpreters, language instructors, and logistics specialists to support JSC's language assistance needs. The use of TTI's services is subject to availability of funding for the JSC component requesting the service.

To the extent that JSC uses language assistance resources that are not provided by the Agency, the JSC LEP Working Group will assist OEOD in providing detailed answers to the following questions:

1. Which Center staff may need to access language assistance services and when, for example Building 110 office personnel?
2. How and through whom does Center staff access the language assistance services?
3. How the acquisition of services is coordinated (for example, will one staff member coordinate language services for the Center or will it be the responsibility of each organization to handle language assistance)?

a) Translation

Translation is the replacement of written text from one language to another. With due consideration to DOJ's Self-Assessment and Planning Tool guidance, the JSC LEP Working Group will make recommendations about what documents or publications to translate and in what languages.

Addressing Translation Needs

The JSC LEP Working Group will convene to determine which of the following, if any, will be given consideration:

1. Signs or posters announcing (both onsite and online as appropriate) the availability of language assistance services for prospective participants in JSC events attended by members of the public. For example, notices advising prospective participants in JSC-sponsored educational programs and activities of the availability of language assistance services (see also Section 4).
2. Content on JSC's website is also updated in non-English languages (priority consideration should be given to content referenced above, e.g. information of interest to the general public regarding NASA missions).
3. Translation of hard-copy Center publications, including Center plans, reports, and publications highlighting NASA's missions and accomplishments. (Ideally, the translated version of a document should be released when the English language version is released. If this is not possible or would substantially delay release of the English version, the translated version should be distributed as soon as possible after the distribution of the English language version.)
4. Building 110-related information.
5. Close coordination with partners in JSC events held onsite or offsite at which LEP individuals are likely to be participants to determine whether translation services will be needed for written materials associated with the event and if so, in which languages translation is needed.

6. Translations are performed consistent with this LEP Plan. For example, a NASA Form 1681, Request for Interpretation/Translation Services is filed with the OIIR Resources Management Division, specifying exactly what translation is needed.
7. Support and assistance are requested from the Center LEP Coordinator, as needed.

b) Interpretation

Interpretation is the rendering of a message spoken in one language into one or more other languages and can take place in person, telephonically, or via internet or video interpreting. With due consideration to DOJ's Self Assessment and Planning Tool guidance, JSC shall make decisions about when to provide interpretation assistance and how to provide that assistance in a timely and effective manner, appropriate to the circumstance. Each organization shall take appropriate steps to ensure that it makes reasonable efforts to provide language assistance as needed for in-person contact with LEP individuals.

Addressing Interpretation Needs

The JSC LEP Working Group will convene to develop guidance that ensures meaningful access by LEP persons to critical services, while not imposing undue cost burdens. The group will give consideration to the following:

1. LEP persons who are:
 - a. part of official delegations seeking assistance in badging or other official business onsite
 - c. participating or wanting to participate in JSC-sponsored educational events
 - d. contacting the center telephonically
2. JSC events held onsite or offsite at which LEP individuals are likely to be participants to determine whether interpretation services will be needed for the event and, if so, in which languages interpretation is needed.
3. To the extent that the JSC Working Group determines needs in the most widely spoken languages, they will consider other cost-effective means for providing LEP services such as identifying a list of bilingual or multilingual POC's across the center, e.g. Employee Resource Groups.
4. Determining the native language of unexpected visitors by using language identification cards (or "I speak cards"), which invite LEP persons to identify their language needs to staff. The Federal Government has made these cards available for free at <http://www.usdoj.gov/crt/cor/13166.htm>.

6. Collaboration with LEP Communities and Other Stakeholders

Organizations external to JSC that have significant contact with LEP persons, such as schools, religious organizations, community groups, and groups working with new immigrants, can potentially be very helpful in linking LEP persons to JSC's programs and its language assistance services.

7. Training Staff on Policies and Procedures

JSC staff with LEP roles and responsibilities, as identified in this plan, must be aware of their obligation to provide meaningful access for LEP persons to JSC services, benefits, and activities. As stated, this will include, at a minimum, OEOD, External Relations Office, and Office of the Chief Information Office. However, other staff, for example, security staff in Building 110 may potentially interact or communicate with LEP individuals. Therefore, training in some form is necessary at the Center level and should be reflected in Center plans.

Training Considerations

1. Is staff aware of the Center LEP plan and its policies and procedures?
2. Is information on language access policies and LEP issues included in mandatory training curriculum for new supervisors, managers, and employees?
3. Has necessary training been provided to staff that are most likely to interact with LEP persons in the course of carrying out their normal roles and responsibilities? Does staff know who to contact when they need language assistance? The more frequent the contact with LEP persons, the greater the need for in-depth training.
4. Training should explain how staff can identify the language needs of an LEP individual, access and provide the necessary language assistance services, work with interpreters, request document translations, and track the use of language assistance services.
5. While individuals with little or no contact with LEP persons may only have to be aware of the Center LEP plans, management staff should be fully aware of and understand these plans so that they can reinforce the plans importance and ensure their proper implementation by staff.
6. To the extent that the Center utilizes bilingual staff members to communicate "in-language" with LEP individuals, or to serve as interpreters or translators, the JSC LEP Coordinator will ensure they receive proper training to serve as an in-house interpreter/translator. For example, the LEP Coordinator will provide them with LEP materials and provide guidance on how to best serve as an in-house LEP interpreter/translator.

8. Monitoring, Continuous Assessment, and Updating LEP Plans

NASA's approach to monitoring JSC's plan is as follows:

- The Agency ODEO, in collaboration with the Agency LEP Working Group, will annually monitor JSC's plan performance in regards to the accessibility and quality of language assistance activities for LEP persons in the Center's conducted programs and activities. This will be accomplished with annual written requests to the Centers to provide information and outcomes regarding each of the Agency plan elements, e.g., providing language services, collaborating with LEP communities, etc.
- The Agency ODEO will modify this plan based on input and feedback from the Agency and Center LEP Working Groups, additional guidance from DOJ on Executive Order 13166 in the conducted programs context, and other information received that the Agency views as critical to enhancing this plan's effectiveness.

Plan Monitoring: Annual Self-Assessment

Each Agency organization and Center shall determine annually the effectiveness of its LEP plan and whether new documents, programs, services, and activities need to be made accessible for LEP persons. Each organization should consider:

1. Does your Center have a written language access policy or procedures (in addition to the Agency's policy)? [This may be in the form of a policy statement from the Center Director or a Center policy directive.]
2. Who is responsible for reviewing the LEP plan for your organization?
3. Are staff with LEP roles and responsibilities under your Center plan aware of the plan and how to implement it?
4. Are additional resources needed to improve access to LEP persons? If so, how will those resources be obtained?
5. When new programs, services, and activities are instituted, what steps do you take to ensure that LEP persons are provided meaningful access to these programs, services, and activities? How are prospective or actual program participants notified that new programs, services, and activities are available?
6. How will changes in the LEP populations served, frequency of encounters, and other potential changes be determined? A vital resource in this evaluation process will be the procedures developed to identify LEP persons who need language assistance. In addition, you may need to obtain feedback
7. Do you obtain feedback from the LEP communities you serve on the effectiveness of your language access program and the language assistance services you provide?
8. How often do you update plan data on the LEP communities in your service area?
9. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?
10. Have you received any complaints because your Center did not provide language assistance services?
11. Overall, based on responses to the foregoing, is existing language assistance providing meaningful access for LEP persons? Is there any room for program enhancement? If so, please describe.

9. Objectives and Timeframes

The objectives and timeframes reflected below are a broad rendering of the first-year actions envisioned under this plan.

<i>Objective</i>	<i>Timeframe</i>
Agency LEP Coordinator Named	July 2011
Center LEP Coordinators Named	July 2011
NASA Agency and Center “Pre-Plan ” Self-Assessments	August 2011
Agency LAP Finalized	September 15, 2011
Center LAP Development	September - December 2011
Agency LEP Working Group Convened	October 2011/Quarterly
Working Group Charter and First-year Agenda Established	December 2011
Center LAPs Finalized	December 15, 2011
Training Provided to all Staff with LEP Roles and Responsibilities	January 2012

Conclusion

JSC has prepared this LAP and will implement it in the spirit of Executive Order 13166. That is, the Center will hold the same standards as Federal civil rights laws, with a goal of serving an ever-growing and ever more diverse population.

Appendix A:

Four-Factor Analysis

Appendix A. Four-Factor Analysis

JSC is required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- (2) The frequency with which LEP individuals come in contact with the program;
- (3) The nature and importance of the program, activity, or service provided by the program to people's lives;
- (4) The resources available to the grantee and costs.

Appendix B:

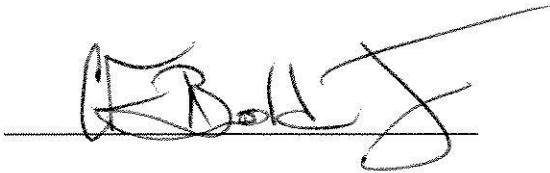
NASA Policy Statement on Language Access for Limited English Proficient (LEP) Persons

NASA Policy Statement on Language Access for Limited English Proficient (LEP) Persons

As guided by Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," NASA's commitment to equal opportunity includes the Agency's efforts to ensure that all members of the public who wish to participate in Agency-conducted programs and activities have an equal opportunity to do so. Whether patrons of our Visitors' Centers, participants in guided tours of our Centers, or students being inspired by our Astronaut corps to become a part of the next generation of explorers, we welcome all.

As part of this commitment, we seek to ensure that people who, as a result of national origin, are limited in their English proficiency have meaningful access to participate in NASA programs and activities. It is, therefore, NASA's policy to seek to provide accessibility to its programs regardless of English language proficiency. Under this policy and to the maximum extent practical, NASA will provide language assistance services to Limited English Proficient (LEP) persons who wish to participate in NASA-conducted programs and activities. We have established an Agency Language Access Plan (LAP), which outlines the strategies and actions we will take on an ongoing basis to address the language assistance needs of LEP persons participating in NASA programs and activities. The LAP sets forth the requirements and procedures to be followed in implementing this policy, as well as enables us to review our programs and activities with the goal of improving accessibility.

This policy and our LAP are an integral part of NASA's efforts to serve as a model for the Nation in providing the widest possible dissemination of our activities and the results of our work as we are required to do under our founding legislation.



Charles F. Bolden, Jr.
NASA Administrator



Date

Appendix C:
Self-Assessment Tool:
Services to Limited English Proficient (LEP)
Populations Self-Assessment

Appendix C. Self-Assessment Tool: Services to Limited English Proficient (LEP) Populations Self-Assessment

NASA Center [Johnson Space Center](#)

I. Understanding How LEP Individuals Interact with Your Center

The following series of questions helps agencies understand how an LEP individual may come into contact with your Center:

1. Does your Center interact or communicate with the public or are there individuals in your Center who interact or communicate or might interact or communicate with LEP individuals?	<input checked="" type="checkbox"/> Yes	No
2. Please describe the manner in which your Center interacts with the public or LEP individuals:	<input checked="" type="checkbox"/> In-Person <input checked="" type="checkbox"/> Telephonically <input checked="" type="checkbox"/> Electronically (e.g. email or website)	Via Correspondence Other: (please specify)
3. Does your Center provide federal financial Assistance to any non-federal entities? (Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds can range from state and local agencies, to nonprofits and other Organizations.)	<input checked="" type="checkbox"/> Yes	No
4. If your Center does provide federal financial assistance to non-federal entities:		
a. Do you have an active program in place to require your recipients of federal financial assistance to comply with Title VI and language access standards?	a. <input checked="" type="checkbox"/> Yes	a. No
b. Does your Center inform recipients of federal financial assistance that they should budget for language assistance services?	b. Yes	b. <input checked="" type="checkbox"/> No
c. Does your Center inform recipients of federal financial assistance about which grants can be used, in whole or in part, to improve language access?	c. <input checked="" type="checkbox"/> Yes	c. Yes

II. Identification and Assessment of LEP Communities

The following series of questions aims to identify the LEP population you serve:

<p>1. How does your Center identify LEP individuals? (Select all that apply)</p>	<p><input checked="" type="checkbox"/> Assume limited English proficiency if communication seems impaired</p> <p><input checked="" type="checkbox"/> Respond to individual requests for language assistance services</p> <p><input checked="" type="checkbox"/> Self-identification by the non-English speaker or LEP individual</p> <p><input checked="" type="checkbox"/> Ask open-ended questions to determine language proficiency on the telephone or in person</p> <p><input checked="" type="checkbox"/> Use of "I Speak" language identification cards or posters</p>	<p>Based on written material submitted to the Center (e.g. complaints)</p> <p>We have not identified non-English speakers or LEP individuals</p> <p>Other: (Please specify)</p>
<p>2. Does your program have a process to collect data on:</p> <p>a. The number of LEP individuals that you serve?</p> <p>b. The number of LEP individuals in your service area?</p> <p>c. The number and prevalence of languages spoken by LEP individuals in your service area?</p>	<p>a. <input checked="" type="checkbox"/> Yes</p> <p>b. <input checked="" type="checkbox"/> Yes</p> <p>c. <input checked="" type="checkbox"/> Yes</p>	<p>a. Yes</p> <p>b. Yes</p> <p>c. Yes</p>
<p>3. How often does your Center assess the language data for your service area?</p>	<p><input checked="" type="checkbox"/> Annually</p> <p>Biennially</p>	<p>Not Sure</p> <p>Other: _____</p>
<p>4. What data does your Center use to determine the LEP communities in your service area? (Select all that apply)</p>	<p>Community Organizations</p> <p>Intake information</p> <p>Other: _____</p> <p><input checked="" type="checkbox"/> Census</p> <p>US Dept. of Education</p> <p>US Dept. of Labor</p> <p>State Agencies</p>	

5. Do you collect and record primary language data from individuals when they first contact your programs and activities?	Yes	<input checked="" type="checkbox"/> No
6. If you collect and record primary language data, where is the information stored?		
7. What is the total number of LEP individuals who use or receive services from your program each year?		
8. How many LEP individuals attempt to access your programs or services each month?		
9. How many LEP individuals use your programs or services each month?		
10. Specify the top six most frequently encountered non English languages by your program and how often these encounters occur (e.g., 2-3 times a year, once a month, once a week, daily, constantly).	Language 1. 2. 3. 4. 5. 6.	Frequency of Encounters 1. 2. 3. 4. 5. 6.

III. Providing Language Assistance Services

The following set of questions will help you assess how well your Center is providing language assistance services to LEP individuals:

1. Does your Center currently have a system in place for tracking the type of language assistance services it provides to LEP individuals at each interaction?	Yes	<input checked="" type="checkbox"/> No
2. What data, if any, do you maintain regarding language assistance services? (Select all that apply)	<input checked="" type="checkbox"/> Primary language of persons encountered or served <input type="checkbox"/> Use of language assistance services such as interpreters and translators <input type="checkbox"/> Funds or staff time spent on language assistance services	Number of bilingual staff Cost of interpreter services Cost of translation of materials into non-English languages Other: (Please specify)_____

3. Does your Center have a system to track the cost of language assistance services?	Yes	<input checked="" type="checkbox"/> No
4. What types of language assistance services does your Center provide? (Select all that apply)	<input checked="" type="checkbox"/> Bilingual staff In-house interpreters (oral) In-house translators (documents) Contracted interpreters Contracted	Language bank or dedicated pool of interpreters or translators Volunteer interpreters or translators Interpreters or translators Borrowed from another Center <input checked="" type="checkbox"/> Telephone interpretation services Video interpretation services Other (Please specify): _____
5. Does your Center:		
a. Have a certification or assessment process that staff must complete before serving as interpreters or translators for LEP individuals?	a. Yes	a. <input checked="" type="checkbox"/> No
b. Does the process include use of standardized language proficiency exams?	b. Yes	b. No
6. Does your Center ask or allow LEP individuals to provide their own interpreters or have family members or friends interpret?	Yes	<input checked="" type="checkbox"/> No
7. Does your Center have contracts with language assistance service providers (in-person interpreters, telephone interpreters, video interpreters, or translators)?	<input checked="" type="checkbox"/> Yes	No
8. Does your Center provide staff with a list of available interpreters and the non-English languages they speak, or information on how to	Yes	<input checked="" type="checkbox"/> No

access qualified interpreters?		
9. Does your Center identify and translate vital documents into the non-English languages of the communities in your service area?	<input checked="" type="checkbox"/> Yes	No
10. Which vital written documents has your Center translated into non-English languages?	Consent forms Complaint forms Intake forms Notices of rights Notice of denial, loss or decrease in benefits or services Notice of disciplinary action	Applications to participate in programs or activities or to receive benefits or services <input checked="" type="checkbox"/> Other (please specify): LEP access information and Spanish speaking POC information.
11. Does your Center translate signs or posters announcing the availability of language assistance services?	<input checked="" type="checkbox"/> Yes	No
12. When your Center updates information on its website, does it also add that content in non-English languages?	Yes	<input checked="" type="checkbox"/> No

IV. Training of Staff on Policies and Procedures

The following series of questions will help you identify whether staff receive appropriate training on your language access policies and procedures:

1. Does all Center staff receive initial and periodic training on how to access and provide language assistance services to LEP individuals?	Yes	<input checked="" type="checkbox"/> No
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2. Who receives staff training on working with LEP individuals? (Select all that apply)	Management or senior staff <input checked="" type="checkbox"/> Employees who interact with or are responsible for interactions with non-English speakers or LEP individuals Bilingual Staff New employees All employees Volunteers <input checked="" type="checkbox"/> Others (Please specify): <u>Building 110 Staff</u>	
3. Are language access policies and LEP issues included in the mandatory training curriculum for staff?	Yes	<input checked="" type="checkbox"/> No
4. Does your Center staff procedural manual or handbook include specific instructions related to providing language assistance services to LEP individuals?	<input checked="" type="checkbox"/> Yes	No
5. Does staff receive periodic training on how to request the translation of written documents into other languages?	Yes	<input checked="" type="checkbox"/> No
6. Do staff members who serve as interpreters receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics?	Yes	<input checked="" type="checkbox"/> No
7. Do staff members who serve as interpreters receive interpreter training from competent interpreters or other trainers familiar with the ethical and professional requirements of an interpreter?	Yes	<input checked="" type="checkbox"/> No

V. Providing Notice of Language Assistance Services

The following series of questions will help you assess how you provide notice of language assistance services to the LEP population in your service area:

1. How do you inform members of the public about the availability of language assistance services? (Select all that apply)	Frontline and outreach multilingual staff Posters in public areas “I Speak” language identification cards distributed to frontline staff <input checked="" type="checkbox"/> Website Social networking website (e.g. Facebook, Twitter) E-mail to individuals or distribution lists Other (Please specify): _____ None of the above	
2. Do your translated program outreach materials inform LEP individuals about the availability of free language assistance services?	Yes	<input checked="" type="checkbox"/> No
3. Does your Center regularly advertise on non-English media (television, radio, newspaper, and websites)?	Yes	<input checked="" type="checkbox"/> No

4. Does your Center inform community groups about the availability of free language assistance services for LEP individuals?	Yes	<input checked="" type="checkbox"/> No
5. Does your Center inform current applicants or recipients about the availability of language assistance services?	<input checked="" type="checkbox"/> Yes	No
6. Does the main page of your Center website include non-English information that would be easily accessible to LEP individuals?	Yes	<input checked="" type="checkbox"/> No
7. Does your Center have multilingual signs or posters in its offices announcing the availability of language assistance services?	<input checked="" type="checkbox"/> Yes	No

VI. Monitoring and Updating a Language Access Procedures, Policy, and Plan

The following set of questions will help you assess whether you have an effective process for monitoring and updating your language access policies, plan and procedures:

1. Does your Center have a written language access policy?	<input checked="" type="checkbox"/> Yes	No
2. If so, is a description of this policy available to the public?	<input checked="" type="checkbox"/> Yes	No
3. How often is your Center's language access policy reviewed and updated?	<input checked="" type="checkbox"/> Annually <input type="checkbox"/> Biennially <input type="checkbox"/> Not Sure <input type="checkbox"/> Other: _____	
4. When was the last time your Center's language access policy was updated?	Month <u>February</u>	Year <u>2011</u>
5. How often does your Center update its data on the LEP communities in your service area?	<input type="checkbox"/> Annually <input type="checkbox"/> Biennially	<input type="checkbox"/> Not Sure <input checked="" type="checkbox"/> Other: <u>Census Data</u>
6. Does your Center have a language access coordinator?	<input checked="" type="checkbox"/> Yes	No
7. Does your Center have a formal language access complaint process?	<input checked="" type="checkbox"/> Yes	No
8. Has your Center received any complaints because it did not provide language assistance services?	Yes	<input checked="" type="checkbox"/> No
9. Do you monitor the system for collecting data on beneficiary satisfaction and/or grievance/complaint filing?	<input checked="" type="checkbox"/> Yes	No

10. Do you obtain feedback from the LEP community on the effectiveness of your language access program and the language assistance services you provide?	Yes	<input checked="" type="checkbox"/> No
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Appendix D:

JSC's LEP Survey

Appendix D. JSC's LEP Survey

Survey: Limited English Proficiency

1. Does your organization have programs or activities that involve public contact?

YES NO

If YES, please address the remainder of the following assessment. If NO, your response will be added as such and no further information will be required.

2. What types of programs or activities is your organization involved with that also involves the public?
3. What resources, if any, has your organization used in the past to accommodate LEP individuals? If none, please indicate so.
Example: Oral Language Assistance – interpreter
Translation of written materials
4. Explain the process of how those services were provided, i.e. which contract/company provided the service, who approved the request, etc...

Please submit responses to Jessica Attocknie at jessica.attocknie@nasa.gov

Appendix E:

NASA LEP Coordinators (as of September 2011)

Appendix E. NASA LEP Coordinators (as of September 2011)

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THIS LANGUAGE ACCESS PLAN WAS PREPARED

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